

1 KAMALA D. HARRIS
 Attorney General of California
 2 JEFFREY R. VINCENT
 Supervising Deputy Attorney General
 3 ROHIT KODICAL
 Deputy Attorney General
 4 State Bar No. 215497
 1515 Clay Street, 20th Floor
 5 P.O. Box 70550
 Oakland, CA 94612-0550
 6 Telephone: (510) 622-2226
 Facsimile: (510) 622-2121
 7 E-mail: Rohit.Kodical@doj.ca.gov
Attorneys for Defendants Bright, Ellis,
 8 *Mack, Sullivan, Tuvera, Warren and Zamora*

9
 10 IN THE UNITED STATES DISTRICT COURT
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 12

13 KEITH THOMAS,

14 Plaintiff,

15 v.

16 ELLIS, et al.,

17 Defendants.
 18

Case No. 3:13-CV-04052-VC

STIPULATION AND ~~PROPOSED~~
ORDER RE: DEFENDANTS' TIME TO
FILE MOTION FOR SUMMARY
JUDGMENT

Courtroom: 4, 17th Floor
 Judge: The Honorable Vince Chhabria
 Action Filed: August 30, 2013

19 WHEREAS: Plaintiff has named nine defendants in this case. Seven defendants have
 20 Answered. Defendants K. Myers and B. Quattlebaum have not been served with the Summons
 21 and Complaint, or Waiver of Service of Summons and have therefore not appeared in this case.
 22 (See ECF Doc. No. 31) Plaintiff did not file the exhibits "B" through "F" to his Complaint or
 23 serve those exhibits on defendants' counsel.

24 Plaintiff wishes to conduct discovery against each of the named defendants. Defendants'
 25 counsel will not receive Plaintiff's medical and dental records via subpoena from Salinas Valley
 26 State Prison until August 21, 2014. Plaintiff's records will likely be voluminous as his alleged hip
 27 injuries date back to 1992. Following review of the medical records, defendants' counsel may
 28 take Plaintiff's deposition regarding his alleged injuries and treatment. Thus, Defendants' counsel

1 will be unable to adequately research, prepare and file a motion for summary judgment on behalf
2 of the nine defendants by the currently scheduled deadline of September 12, 2014.

3 IT IS HEREBY STIPULATED: Defendants' motion for summary judgment shall be due
4 on December 12, 2014.

5
6 Dated: July 16, 2014

Respectfully submitted,

7 KAMALA D. HARRIS
8 Attorney General of California

9 s/ *Rohit Kodical*

10 ROHIT KODICAL
11 Deputy Attorney General
Attorneys for Defendants

12 Dated: July __, 2014

KEITH THOMAS

14 Keith Thomas
15 Plaintiff *pro se*

16
17 **ORDER**

18 Upon good cause shown, the above Stipulation of the parties is hereby approved and made
19 the Order of this Court.

20
21 Dated: September 17, 2014

